

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

FIRST-CITIZENS BANK & TRUST
COMPANY,

Plaintiff,

vs.

RECLEIM-SC, LLC,

Defendant.

Case No.1:23-cv-00370-MGL

**RECYCLE PHOENIX FUND, LLC'S
MOTION TO INTERVENE**

Proposed Defendant/ Intervenor Recycle Phoenix Fund, LLC ("Recycle Phoenix") moves to intervene in the matter pursuant to Rule 24 of the Federal Rules of Civil Procedure. In support of this motion, Defendant relies on its supporting Memorandum of Law submitted contemporaneously herewith.

WHEREFORE, Recycle Phoenix respectfully requests Recycle Phoenix be permitted to intervene and file its proposed Answer, attached herein, and for such other and further relief as the Court deems just and proper.

Respectfully submitted this the 1st day of April, 2025.

BRADLEY ARANT BOULT CUMMINGS LLP

/s/ John McCool
John McCool (SC Bar No. 14201)
214 N. Tryon Street, Suite 3700
Charlotte, NC 28202
Telephone: (704)338-6000
Facsimile: (704) 332-8858
jmccool@bradley.com

*Attorney for Proposed Intervenor
Recycle Phoenix Fund, LLC*